

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SUE MI TERRY,

Defendant.

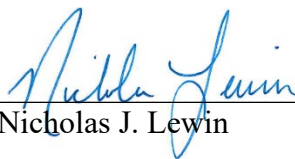
24 Cr. 427 (LGS)

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Dr. Sue Mi Terry's Pretrial Motions, the Declaration of Nicholas J. Lewin, the Declaration of Dr. Sue Mi Terry, and the prior pleadings and proceedings heretofore had herein, Defendant Dr. Sue Mi Terry respectfully moves this Court before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York 10007, at such date and time as the Court may direct, for an Order dismissing the Indictment or, in the alternative, granting Dr. Terry's pretrial motions: (i) directing the government to produce a bill of particulars, (ii) suppressing Dr. Terry's coerced statements, and (iii) suppressing information and materials that were unlawfully obtained pursuant to the Foreign Intelligence Surveillance Act of 1978 ("FISA"), as amended, 50 U.S.C. §§ 1801–1812 and 1821–1829, and granting such other and further relief as the Court deems appropriate.

Dated: New York, New York
February 26, 2025

Respectfully submitted,

By: 
Nicholas J. Lewin

KRIEGER LEWIN LLP
350 Fifth Avenue, 77th Floor
New York, NY 10118
Telephone: (212) 390-9550
Nick.Lewin@kriegerlewin.com
Melissa.Danzo@kriegerlewin.com

SELENDY GAY PLLC
1290 Avenue of the Americas
New York, NY 10104
Telephone: (212) 390-9000
FGay@selendygay.com
TAgangaWilliams@selendygay.com
JBean@selendygay.com

WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, NY 10019-6099
Telephone: (212) 728-8000
lwoolosky@willkie.com

JENNER & BLOCK LLP
1155 Avenue of the Americas
New York, NY 10036-2711
Telephone: (212) 891-1600
abarkow@jenner.com
abernstein@jenner.com
jgordon@jenner.com

Attorneys for Dr. Sue Mi Terry